

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

-v-

24-MC-6018

\$408,214.00 UNITED STATES CURRENCY et. al.,

Defendant.

**STIPULATION TO EXTEND PLAINTIFF'S TIME
TO FILE COMPLAINT IN CIVIL FORFEITURE ACTION**

The United States of America by its attorney, Trini E. Ross, United States Attorney for the Western District of New York, Mary Clare Kane, Assistant United States Attorney, of counsel, and Michael P. Schiano, Esq., attorney for Tanesha James-Mundy, hereby stipulate and agree to extend the government's time period to commence a judicial forfeiture action of the above-captioned seized property from December 30, 2024 to 30 days after the entry of the final disposition of the criminal case, including any subsequent appeals, by criminal judgment, mandate, or other termination of proceedings in the related criminal action initiated by criminal complaint, United States v. Michael Roper et. al., (24-MJ-04101-MWP), pending in the Western District of New York, pursuant to Title 18, United States Code, Sections 983(a)(3)(A) and 983(a)(3)(C).

The parties to this Stipulation further agree that Tanesha James-Mundy may revoke her consent in writing to extend the time for the government to file its Verified Complaint for Forfeiture against the above-named property, and in that event, the government shall then

have twenty-one (21) days from the date the government received notice of such action to file its Verified Complaint for Forfeiture.

TRINI E. ROSS
United States Attorney
Western District of New York

Dated: October 29, 2024

BY: Mary Clare Kane
Mary Clare Kane
Assistant United States Attorney
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Dated: October 28, 2024

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Attorney for Tanesha Mundy

The terms set forth above, and agreed upon by counsel for the respective parties in this action are hereby approved.

SO ORDERED.

Dated: _____
Rochester, New York

HON. MARIAN W. PAYSON
UNITED STATES DISTRICT JUDGE